



Application GRANTED. Defendant HUSA Management Co., LLC's deadline to respond to Defendants Rainbow Apparel of America, Inc. and A.I.J.J. Enterprises, Inc.'s Cross-Claims is extended to **March 26, 2025**. Defendants Rainbow Apparel of America, Inc. and A.I.J.J. Enterprises, Inc.'s deadline to respond to Defendants Commonwealth Local Development Corp. and HUSA Management Co., LLC's Cross-Claims is extended to **April 10, 2025**.

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February 20, 2025

The Clerk of Court is directed to terminate ECF No. 32.

**VIA ECF AND E-MAIL**

Hon. Jennifer H. Rearden  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 1010  
New York, NY 10007  
ReardenNYSDChambers@nysd.uscourts.gov

SO ORDERED.

A handwritten signature in blue ink that reads 'Jennifer H. Rearden'.

Jennifer H. Rearden, U.S.D.J.

Dated: February 23, 2025

**Re: *Freeman v. Commonwealth Local Development Corp., et al.*,  
Civil Action No.: 1:24-cv-08823**

Dear Judge Rearden:

This firm represents Defendants Rainbow Apparel of America, Inc. (incorrectly referenced in the Complaint as "Rainbow USA Inc.") and A.I.J.J. Enterprises, Inc. (collectively, "Rainbow") in the above-referenced matter. We write, jointly with Defendants Commonwealth Local Development Corp. and HUSA Management Co., LLC (collectively, "HUSA"), to respectfully request that the Court extend the respective deadlines for Rainbow and HUSA to respond to each other's cross-claims.

By way of background, on February 3, 2025, Rainbow filed its answer with cross-claims (ECF No. 28), making HUSA's response due on or before February 24, 2025. See Fed. R. Civ. P. 12(a)(1)(B). On February 18, 2025, HUSA filed its answer with cross-claims (ECF No. 30), making Rainbow's response due on or before March 11, 2025. See Fed. R. Civ. P. 12(a)(1)(B).

The parties are in the process of scheduling a mediation in this matter as per the Court's Mediation Referral Order (ECF No. 6). Rainbow and HUSA are presently discussing certain responsibilities and obligations under the lease documents that may bear on how Defendants respond to the cross-claims directed against them, and respectfully request additional time to continue these discussions. Accordingly, Defendants respectfully request that: (1) HUSA be provided until March 26, 2025 to respond to Rainbow's cross-claims; and (2) Rainbow be provided until April 10, 2024 to respond to HUSA's cross-claims.

This application is being filed in good faith, and not to cause undue delay. This is the first application for an extension of time to respond to the cross-claims that, if granted,



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would not affect any scheduled dates or deadlines. There are currently no scheduled appearances before the Court. The undersigned has communicated with counsel for HUSA, and HUSA joins in this application.

Respectfully submitted,

SEYFARTH SHAW LLP

/s/ John W. Egan

John W. Egan

cc: All counsel of record (via ECF)

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